UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

---X

FEDERAL INSURANCE COMPANY *as subrogor of* AAA MID-ATLANTIC, INC.,

Plaintiff,

-against-

AMERICAN HOME ASSURANCE COMPANY AND NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA,

Defendant.

---X

1:07-cv-6422(VM)(GWG)

AFFIDAVIT IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

STATE OF NEW YORK)
)ss:
COUNTY OF NEW YORK)

Judith F. Goodman, being duly sworn, hereby deposes and says:

1. I am a member of Goodman & Jacobs LLP, counsel for plaintiff Federal Insurance Company *as subrogor* of AAA Mid-Atlantic, Inc., ("Federal") in the above-captioned action. I am familiar with the proceedings in this case. I make this affidavit based upon my personal knowledge and upon information and belief, the sources of which include my communication with the law firm of Barrasso, Usdin, Kepperman, Freeman & Sarver, LLC.

2. I respectfully submit this affidavit in support of Federal's motion to admit Steven W. Usdin as counsel pro hac vice to represent Federal in this matter.

3. I am a member in good standing of the bar of the State of New York, and I was admitted to practice law in 1980. I am also admitted to the bar of the United States District Courts for the Southern and Eastern Districts of New York, the United States Court of Appeal for the Second Circuit, and the United States Supreme Court, and I am in good standing with this Court.

4. Mr. Usdin is a partner of Barrasso, Usdin, Kepperman, Freeman & Sarver, LLC, in New Orleans, Louisiana.

5. To my knowledge Mr. Usdin is a skilled attorney, and has been a member of the bar of the State of Louisiana since 1980, and is of high moral character. I also understand that he has been admitted to practice before the following Courts: the United States District Courts for the Eastern, Western and Middle Districts of Louisiana, the United States Courts of Appeal for the Fifth and Eleventh Circuits, and the United States Tax Court.

6. Accordingly, I am pleased to move the admission of Mr. Usdin, pro hac vice.

7. I respectfully submit a prepared Order granting the admission of Mr. Usdin, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Steven W. Usdin, pro hac vice to represent plaintiff Federal in the above matter, be granted.

Dated: July 31, 2007
New York, New York

Respectfully submitted,

Judith F. Goodman (JFG-7031)

Sworn to before me on this
31 day of July, 2007.

Notary Public

RICHARD E. SCHMEDAKE
Notary Public, State of New York
No. 02SC6016237
Qualified in Kings County
Commission Expires November 16, 2010

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FEDERAL INSURANCE COMPANY *as subrogor of* AAA MID-ATLANTIC, INC.,

Plaintiff,

-against-

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Defendant.

---X

1:07-cv-6422(VM)(GWG)

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Judith F. Goodman, attorney for Federal Insurance Company *as subrogor of* AAA Mid-Atlantic, Inc. ("Federal") in the above-captioned action, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Steven W. Usdin
Barrasso, Usdin, Kepperman, Freeman & Sarver, LLC
909 Poydras Street, Ste. 1800
New Orleans, Louisiana 70112
(504) 589-9721
susdin@barrassousdin.com

is admitted to practice pro hac vice as counsel for Federal in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: New York, New York
August __, 2007

____
United States District/Magistrate Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

---X

FEDERAL INSURANCE COMPANY *as subrogor of* AAA MID-ATLANTIC, INC.,

Plaintiff,

-against-

AMERICAN HOME ASSURANCE COMPANY AND NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA,

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1:07-cv-6422(VM)(GWG)

MOTION FOR ADMISSION PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Judith F. Goodman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Steven W. Usdin
Barrasso, Usdin, Kepperman, Freeman & Sarver, LLC
909 Poydras Street, Ste. 1800
New Orleans, Louisiana 70112
(504) 589-9721
susdin@barrassousdin.com

Steven W. Usdin is a member in good standing of the Bar of the State of Louisiana, the United States District Courts for the Eastern, Western and Middle Districts of Louisiana, the United States Courts of Appeal for the Fifth and Eleventh Circuits, and the United States Tax Court. There are no pending disciplinary proceedings against Steven W. Usdin in any state or federal court.

A copy of the Certificate of Good Standing issued by the Supreme Court of the State of Louisiana is annexed hereto.

Dated: New York, New York
July 31, 2007

GOODMAN & JACOBS LLP

Judith F. Goodman (JFG-7031)

75 Broad Street –30th Floor
New York, New York 10004
(212) 385-1191
Attorneys for Plaintiff
Federal Insurance Company
as subrogor of AAA Mid-Atlantic, Inc.

TO: Lisa C. Wood, Esq.
Schwartz, Simon, Edelson, Celso & Kessler, LLP
Attorneys for Defendants
American Home Assurance Company and
National Union Fire Insurance Company of Pittsburgh, PA
845 Third Avenue, 17th Floor
New York, New York 10022
(212) 752-5258

United States of America

State of Louisiana

Supreme Court of the State of Louisiana

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

STEVEN WILLIAM USDIN, ESQ., #12986

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 18th Day of November, 1980 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign my name and affix the seal of this Court, at the City of New Orleans, this the 24th Day of July, 2007, A.D.

Clerk of Court
Supreme Court of Louisiana

AFFIDAVIT OF SERVICE

STATE OF NEW YORK
COUNTY OF NEW YORK

Andrew Reger, being duly sworn deposes and says: Deponent is not a party to the action, is over 18 years of age, and is employed in New York, New York.

On July 31, 2007 deponent served the within:

MOTION FOR ADMISSION PRO HAC VICE

Upon: Lisa C. Wood, Esq.
Schwartz, Simon, Edelson, Celso & Kessler, LLP
Attorneys for Defendants
American Home Assurance Company and
National Union Fire Insurance Company of Pittsburgh, PA
845 Third Avenue, 17th Floor
New York, New York 10022
(212) 752-5258

the address designated by said attorney(s) for that purpose by depositing a true copy of same enclosed in a post-paid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.

Andrew Reger

Sworn to before me on this
31st day of July, 2007

Notary Public

RICHARD E. SCHMEDAKE
Notary Public, State of New York
No. 02SC6016237
Qualified in Kings County
Commission Expires November 16, 20 07

AFFIDAVIT OF SERVICE

STATE OF NEW YORK
COUNTY OF NEW YORK

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Upon: Lisa C. Wood, Esq.
Schwartz, Simon, Edelson, Celso & Kessler, LLP
Attorneys for Defendants
American Home Assurance Company and
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845 Third Avenue, 17th Floor
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Andrew Reger

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